

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-cr-223 (NEB/DTS)**

United States of America,

Plaintiff,

vs.

**Abdirahman Mohamud Ahmed,**

Defendant.

**MOTION TO CONTINUE AND  
TO EXCLUDE PERIOD OF  
CONTINUANCE FROM THE  
SPEEDY TRIAL ACT**

Abdirahman Ahmed, through counsel, respectfully offers the following motion to continue his trial and all attendant deadlines and motions in his case, and to exclude the period of this continuance from the Speedy Trial Act clock. For the reasons outlined below, Mr. Ahmed seeks a three-month extension of the proceedings. This extension was discussed with the government, and the government stated that it did not object to either the extension request or amount.

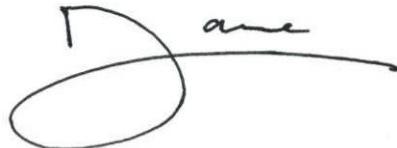
The defense therefore respectfully requests additional time given that Mr. Ahmed received new trial counsel on July 11, 2025. Given the size and scope of the case, trial counsel needs *a minimum of three months* to prepare the case for all pretrial and trial matters. At the end of the three months, trial counsel will confer with the government to discuss whether more time is needed for trial preparation or if the case is ready to proceed to trial.

Accordingly, the facts outlined in the statement above support a suspension of proceedings, in light of which the requested extension is in the interest of justice, and as such is supported by the Speedy Trial Act, 18 U.S.C. § 3161, et seq. Counsel has discussed the Speedy Trial Act and its application to this case with Mr. Ahmed, who understands and supports the requested extension.

The defense therefore respectfully moves for: (1) a three-month continuance of the schedule and deadlines for pretrial motions proceedings that have been set in this case; and (2) for a determination that the period of delay occasioned by this continuance should be excluded from the speedy trial computation on the ground that the interest of justice served by granting the requested continuance outweighs the interest of the public and the defendant in a speedy trial. A proposed, draft order is offered under separate cover.

Date: July 23, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane".

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Dane DeKrey (#0397334)  
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